

 CIN - U40108CT2003SGC015820	CHHATTISGARH STATE POWER TRANSMISSION COMPANY LIMITED छत्तीसगढ़ राज्य विद्युत पारेषण कम्पनी मर्यादित (C.G. Govt. Undertaking) (छत्तीसगढ़ शासन का एक उपक्रम) CHHATTISGARH STATE LOAD DESPATCH CENTRE: RAIPUR छत्तीसगढ़ राज्य भार प्रेषण केन्द्र, रायपुर PHONE: 0771- 2574172 Website: www.sldccg.com FAX NO. 0771-2574174 Email- ra.csldc@sldccg.com
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Ref: 03-02/SLDC/ 2751

Raipur, dtd.-

20 MAR 2024

To,

The Secretary,
Chhattisgarh State Electricity Regulatory Commission,
Irrigation Colony, Shanti Nagar,
Raipur, Chhattisgarh - 492001

Sub: Comments/views on draft of Chhattisgarh State Electricity Regulatory Commission (Intra-State Deviation Settlement Mechanism and Related Matters) Regulations, 2024.

Ref: As published in Hon'ble CSERC web site regarding Objections and suggestions are invited on Draft Chhattisgarh State Electricity Regulatory Commission (Intra-State Deviation Settlement Mechanism and Related Matters) Regulations, 2024 by 20/03/2024.

In above subjected matter CSLDC's submission is enclosed herewith in compliance with the directives of Hon'ble CSERC on the draft of Chhattisgarh State Electricity Regulatory Commission (Intra-State Deviation Settlement Mechanism and Related Matters) Regulations, 2024.

Encls: As Above. (Page No. 1 to 6)


Executive Director
SLDC, CSPTCL, Raipur

Chhattisgarh State Electricity Regulatory Commission
Irrigation Colony, Shanti Nagar, Raipur (C.G.)
Raipur, Dated 01/03/2024

DRAFT

No. D-17/CSERC/2024

In exercise of the powers conferred by Section 181 read with clause (c) of sub-section (1) of Section 86 of the Electricity Act 2003, the Chhattisgarh State Electricity Regulatory Commission hereby makes the following Regulations:-

Chhattisgarh State Electricity Regulatory Commission (Intra-State Deviation Settlement Mechanism and Related Matters) Regulations, 2024

1. DEFINITIONS

In these Regulations, unless the context otherwise requires:

- 1.36. “QCA (Qualified Co-coordinating Agency and/or Lead generator)” means the lead generator or any authorized agency, registered with SLDC, on behalf of Renewable Energy Generating Station (REGS) or Renewable Energy Hybrid Generating Station (RHGS) including Energy Storage Systems connected to one or more pooling station(s) for coordinating with SLDC for providing operational data (available capacity, forecasting, real-time data), scheduling, operational coordination and deviation settlement as specified in CERC IEGC - 2023;

Reason : As per the Role of Entities (QCA) mentioned in CERC IEGC - 2023. No separate clause/regulation is specifically mentioned about the Roles of QCA in this draft CSERC DSM regulation 2024 therefore, it is compiled in definition. Further, SLDC is in receipt of applications from multiple solar generators regarding registration of QCA in SLDC.

8. SCHEDULING AND DESPATCH

- 8.2. For long-term open access customers and medium-term open access customers, the provisions of the CERC IEGC 2023, CSERC State Grid Code - 2011 and the CSERC (Connectivity and Intra-State Open Access) Regulations 2011, as amended from time to time, shall be applicable for declaration of capacity and scheduling. For supply of power on “D” day, the Seller shall submit daily declared capacity by 07:00 Hrs of “D-1” day and accordingly the Buyers including beneficiary shall submit their requirement to SLDC in 15 minutes time block by 08:00 07:30 Hrs of “D-1” day. If no confirmation from Seller/ Buyer including beneficiary is received within above time limit, SLDC shall consider zero declared capacity/ requirement. Accordingly, SLDC shall issue the drawal and injection schedules by 09:30 Hrs of “D-1” day.

~~Provided that in case of forced outages, the generator shall be allowed 02 revisions of day-ahead declared capacity upto 22:00 Hrs of the “D-1” day. Thereafter, no changes shall be registered in the schedule on day-ahead basis.~~

Reason : As per the Scheduling and Despatch procedure mentioned in 49(1) and Day-ahead demand estimation timeline mentioned in 31(2) CERC IEGC - 2023. Revision in case of forced outage as well as partial outage has been included in regulation 8.7 (as proposed by SLDC).

- 8.3. ~~The Seller supplying power on short term basis shall submit monthly declared capacity along with documentary proof of payment of open access charges in advance by "D-7" day for supply of power starting from "D" day, which may either fall in the same month as the "D-7" day or in subsequent month and accordingly the Buyers (including CSPDCL) shall submit their requirement to SLDC in 15 minutes time block and by considering these the SLDC shall finalize the injection/drawl schedule. If the Sellers/Buyers fails to submit the declared capacity/drawl requirement by "D-7" day as mentioned above, for the scheduling of power in next month, then the same shall be considered as zero for all purposes. However, maximum of two applications for revisions of schedule per month under advance intimation to SLDC and Buyer shall be allowed with effect from 00:00 hours of next day.~~

A Seller/Buyer availing intra-state STOA for supply/procurement of power starting from "D" day, which may either fall in the same month as the "D-7" day or in subsequent month, shall ensure STOA approval issued by SLDC before "D-7". The documentary proof of the payment of STOA charges shall be submitted by the seller/buyer as per STOA approval to SLDC within three working days of grant of STOA. The SLDC shall schedule power for such STOA only after receiving confirmation of payment from the applicant (Seller/Buyer) as per Regulation 30 of CSERC (Connectivity and Intra-state Open Access) Regulations 2011, as amended from time to time.

After confirmation of payment of open access charges as per STOA approval, SLDC shall convey the same to Seller/Buyer via email. Accordingly Seller/Buyer shall submit their declared capacity/requirement, as per the approved STOA period, in SLDC web-scheduling portal in 15 minutes time block so that SLDC would schedule power for such STOA. By considering these, SLDC shall finalize the injection/drawl schedule. If the Sellers/Buyers fails to submit the declared capacity/requirement, as per the approved STOA period, by "D-1" day by 07:00 Hrs (Seller) / 07:30 Hrs (Buyer including CSPDCL) for scheduling of power, then the same shall be considered as zero for all purposes. However, maximum of two revisions of schedule per month shall be allowed to the seller (under advance intimation to SLDC and Buyer including CSPDCL) which shall be effective from 00:00 Hrs of next day.

Provided also that the Seller/ Buyer availing intra-state short term open access, and seeking cancellation or downward revision in short term open access quantum, shall be dealt as per Regulation 40(2) of CSERC (Connectivity and Intra-state Open Access) Regulations 2011, as amended from time to time.

Illustration:

~~A Seller/Buyer availing intra-state STOA for the period starting from 01.04.2024 (D Day) to 31.04.2024, shall submit monthly DC/ Requirement in SLDC WBES by 23.03.2024 ("D-7" day). Accordingly, Seller/ Buyer availing intra-state STOA shall ensure STOA approval issued by SLDC before 23.03.2024.~~

A Seller/Buyer availing intra-state STOA for the period starting from 01.04.2024 (D Day) to 30.04.2024, shall ensure STOA approval issued by SLDC before 24.03.2024 ("D-7" day). The documentary proof of the payment of STOA charges shall be submitted by the seller/buyer as per STOA approval to SLDC within three working days, by 28.03.2024 (24.03.2024 & 25.03.2024 being general holiday for Sunday and Holi respectively) of grant of STOA. After confirmation of payment of open access charges as per STOA approval, SLDC shall convey the same to Seller/Buyer by 28.03.2024 via email. Accordingly Seller/Buyer shall submit their declared capacity/requirement, as per the approved STOA period of 01.04.2024 (D Day) to 30.04.2024, in SLDC web-scheduling portal in 15 minutes time block so that SLDC would schedule power for such STOA. If the Sellers/Buyers fails to submit the declared capacity/requirement, as per the

approved STOA period of 01.04.2024 (D Day) to 30.04.2024, by 07:00 Hrs (Seller) / 07:30 Hrs (Buyer including CSPDCL) of 31.03.2024 ("D-1" day), then the same shall be considered as zero for all purposes.

Reason : Regarding clarity for Scheduling of STOA to be started after ensuring payment of open access charges as per regulation 30 of CSERC-OAC-2011.

- 8.6. In case of day ahead transactions of short-term open access, the declared capacity/schedules shall be conveyed by the Seller to SLDC; in one day advance up to 07.00 Hrs of the day. The Buyer including beneficiary shall confirm the time-block wise requirement to SLDC in one day advance up to ~~08:00~~ 07.30 Hrs of the day. If no confirmation from Seller/ Buyer including beneficiary is received within above time limit, SLDC shall consider zero declared capacity/ requirement. Accordingly, SLDC shall issue the drawl and injection schedules by 09:30 Hrs of the day for the next day.

~~Provided that in case of forced outage of unit or major auxiliary, the generator shall be allowed 02 revisions of day-ahead declared capacity upto 22:00 Hrs of the day. Thereafter, no changes shall be registered in the schedule on day-ahead basis.~~

Reason : As per the Scheduling and Despatch procedure mentioned in regulation 49(1) and Day-ahead demand estimation timeline mentioned in regulation 31(2) CERC IEGC - 2023. Revision in case of forced outage as well as partial outage has been included in regulation 8.7 (as proposed by SLDC).

- 8.7. ~~To discourage frivolous revisions, SLDC may, refuse to accept schedule/capability changes of less than two (2) percent of previous schedule/capability or 0.5 MW whichever is more. The schedule shall not be revised except in case of forced outage of generating unit.~~

~~The revisions of schedule of a generator shall be effective from 4th time block, the first being the time block in which revision was submitted. There may be maximum of 8 revisions of the schedule during the day starting from 00:00 Hrs of the day.~~

~~Provided also that in case of a plant emergency, where multiple units trip the ceiling of 8 revisions in a day may be relaxed.~~

As the revision of DC deprives the beneficiaries of the entitled power and may disturb the portfolio management of the beneficiaries. Frequent revisions of DC create uncertainty for the beneficiaries and must be minimized. However in view of the difficulties faced by various types of generating stations, a maximum of 4 (four) revisions of Declared Capacity and schedule per day subject to maximum 60 (sixty) revisions during a month shall be allowed to generating stations or ESS, except lignite, gas based thermal generating stations and hydro generating stations, due to reasons such as forced outage of unit of a generating station or ESS (as an injecting entity) and partial outage of the unit or variation of fuel quality or any other technical reason to be recorded in writing.

The lignite based, gas based thermal generating stations and hydro generating stations shall be allowed for 6(six) revisions of Declared Capacity and schedule in a day subject to maximum 120 (One hundred twenty) revisions during a month, due to reasons such as forced outage of unit of a generating station or ESS (as an injecting entity) and partial outage of the unit or water availability for hydro generating stations, fuel quality or variations in supply of gas for gas generating stations or any other technical reason to be recorded in writing.

Provided that in case of a plant emergency, where multiple units trip the above ceiling of 4 revisions or 6 revisions of Declared Capacity and schedule, as the case may be, per day may be relaxed. Also in such cases, the above ceiling of 60 (sixty) revisions and 120 (One hundred twenty) revisions of Declared Capacity and schedule, as the case may be, per month may be relaxed.

Provided also that, revisions of day-ahead declared capacity shall be allowed upto 22:00 Hrs of the "D-1" day, for supply of power on "D" day. Thereafter, no changes shall be registered in day-ahead declared capacity. The intra-day revisions of schedule of a generator for supply of power from 00:00 Hrs of the day shall be effective from 4th time block, the first being the time-block in which revision was submitted.

Reason : As per prevailing practices of revisions in DC and Schedule in line with CERC order dtd. 18/12/2023 in suo-moto petition 18/SM/2023 towards regulation 49(7) of CERC IEGC - 2023.

- 8.11. In case of any grid disturbance, scheduled injection of the Sellers and scheduled drawl of the Buyers shall be deemed to have been revised in proportion to their actual generation/drawl for all the time blocks affected by the grid disturbance. Certification of grid disturbance and its duration *by the concerned licensee*, shall be published by the SLDC/CSPDCL in its website within a week of its occurrence.

Provided that in absence of certification by CSPDCL in their website within a week of its occurrence, CSPDCL shall certify the "Request Form" as per the provisions and timelines prescribed in the "Procedure" prepared by SLDC for revised SDSMA on account of Grid Disturbance on CSPTCL and/or CSPDCL system.

Provided further that any request for processing "Request Form" beyond timelines of the above "Procedure" shall not be considered by SLDC.

Provided further that in order to monitor the above Grid Disturbance, the Sellers and Buyers shall ensure necessary compliance of "Operational Event and Incident Reporting" and "Telemetry Requirements" as specified in the State Grid Code - 2011 as amended from time to time.

Reason : In compliance to CSERC order dtd. 05/12/2022 & 19/12/2022, a "Procedure" dtd. 11/08/2023 for revision of Implemented Schedule for Revised SDMA of account of Grid-Disturbance/Tripping/Interruptions has been formulated by SLDC with intimation to Hon'ble CSERC. The module for the same was inaugurated by ED(Trans.), CSPTCL on 05/08/2023 and made GO-LIVE from 01/09/2023. Accordingly, implemented schedule was revised and Final SEA report for the month of Aug-23 was issued on 22/09/2023 and based on Final SEA, the SDSMA was issued on dtd. 27/09/2023.

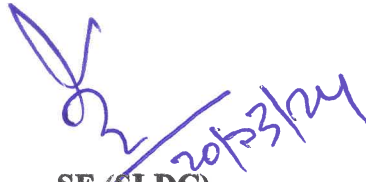
Therefore, the above suggestion has to be incorporated to expedite the process of revised Implemented Schedule/SDSMA on account of Grid-Disturbance/Tripping/Interruptions.

Further, the incorporation of the above "Procedure" dtd. 11/08/2023 in the new Scheduling and Dispatch procedure as per Regulation 8.16 mentioned below may take time which would unnecessarily lead to delay in revising SDSMA and eventually non-compliance of CSERC order dtd. 05/12/2022 & 19/12/2022 on part of SLDC.

Draft CSERC (Intra-State Deviation Settlement Mechanism and Related Matters) Regulations

- 8.16. ~~On an application received from the SLDC, the Commission shall approve the Scheduling and despatch procedure from time to time. Till such application is received the provisions specified in these Regulations shall be applicable.~~

Reason : The above clause will deprive SLDC from complying Hon'ble CSERC order dtd. 05/12/2022 & 19/12/2022 for revision of Implemented Schedule for Revised SDMA of account of Grid-Disturbance/Tripping/Interruptions and ultimately delay in revising SDSMA of affected biomass generators who are applying for grid disturbance incidents since the inception of DSM regulation, 2016. Therefore, the above clause may be reviewed.


SE (SLDC)
CSPTCL, Raipur


EE (SLDC)
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Comments and suggestions/views on second draft Chhattisgarh State Electricity Regulatory Commission (Intra-State Deviation Settlement Mechanism and Related Matters) Regulations, 2024 issued by Hon'ble CSERC on dtd. 01/03/2024

1. **Draft Regulation (3.37):** -“Reference Charge Rate” means (i) in respect of a general Seller whose tariff is determined under Section 62 or Section 63 of the Act, energy charge in Rs/ KWh (including FCA charge for the respective month) as determined by the Appropriate Commission, or (ii) in respect of a Hydro Seller whose tariff is determined under Section 62 or Section 63 of the Act, Tariff in Rs/KWh as determined by the Appropriate Commission, or (iii) in respect of a general Seller whose tariff is not determined under Section 62 or Section 63 of the Act, the reference charge rate shall be equal to the normal rate of charge as considered by WRPC in the DSM Statement issued to CSPDCL”

Proposal: - In this Regulation, the FCA charges will be considered for calculation of deviation charges, but it is not mentioned the name of agency, which will provide the FCA charges to SLDC. Therefore it is proposed to mention the name of agency along with the timeline to provide the FCA charges to SLDC.

2. **Draft Regulation 9.5 to Regulation 9.8** - The provision for MSC buyer is specified for settlement of Demand charges, but the provision for settlement of deviation against open access schedule is not specified in these Regulations.

Proposal: - “It is proposed to mention the specific provision for MSC to settlement of deviation against open access schedule.”

3. **Draft Regulation 6.2 (3)** – The words “RE Seller” as mentioned in this Regulation is not defined in the Regulations.”

Proposal: - “The Words “RE Seller” should be replaced with the Words “Hydro Seller”, since there is no any specific category in the name of RE Seller, but there is a category of “Hydro Seller” mentioned in the table under Regulation 6.4 (5)”.

4. **Draft Regulation 6.4 (5)** – In the table under Regulation 6.4 (5), the sentence “@ the weighted average ACP of the Day Ahead market segments of all power Exchanges for the respective time block as considered by WRPC in the DSM Statement issued to CSPDCL” is mentioned.

Proposed:- Since the ACP is neither declared by the WRPC nor ACP rate is mentioned in the DSM Statement issued to CSPDCL by WRPC, so the above sentence should be replaced with the following lines:-

“@ the weighted average ACP of the Day Ahead market segments of all power Exchanges for the respective time block as declared by NLDC in its website or in absence of the weighted average ACP, @normal rate of charges for deviation considered by WRPC in the DSM Statement issued to CSPDCL”


Executive Engineer (DSM)
O/o ED, SLDC, CSPTCL,
Raipur